

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SYSCO CORPORATION,

Plaintiff,

-vs.-

BUMBLE BEE FOODS, LLC, STARKIST COMPANY, DONGWON INDUSTRIES CO. LTD., DEL MONTE CORPORATION, TRI-UNION SEAFOODS LLC D/B/A CHICKEN OF THE SEA INTERNATIONAL, INC., and THAI UNION GROUP PCL,

Defendants.

Case No.: 4:18-cv-00169

Jury Trial Demanded

**PLAINTIFF'S MOTION TO FILE PORTIONS OF
ITS COMPLAINT UNDER SEAL**

Pursuant to Local Rule 83.6, Plaintiff Sysco Corporation (“Sysco”) hereby respectfully submits this motion (“Motion”) for leave to file under seal certain information contained in its Complaint.¹ In support of the Motion, Sysco states as follows:

1. On January 19, 2018, Sysco filed a Complaint in the United States District Court for the Southern District of Texas.
2. Sysco’s Complaint contains allegations similar to other cases currently proceeding in multidistrict litigation (“MDL”) before the United States District Court for the Southern District of California.

¹ Pursuant to Local Rule 83.6, concurrently with this Motion, Sysco is provisionally filing its Complaint electronically under seal. Sysco filed a redacted version of the Complaint on January 22, 2018.

3. Because certain information referred to or described in Sysco's Complaint has been designated as confidential by defendants pursuant to the Stipulated Protective Order entered by the Southern District of California as part of the MDL litigation, Sysco believes that the circumstances require redaction of that material from the version of the Complaint that is filed in the public record in this Court. The MDL court, the Southern District of California, previously ordered the sealing of substantially similar material from pleadings by other plaintiffs as part of the MDL proceedings.

4. Sysco has therefore filed electronically a redacted version of its Complaint, and hereby respectfully moves the Court for leave to permit it to file the unredacted version of its Complaint under seal.

WHEREFORE, Plaintiff Sysco Corporation requests leave to file the unredacted version of its Complaint under seal.

Respectfully Submitted,

Dated: January 22, 2018

/s/ Scott E. Gant

Scott E. Gant (attorney-in-charge)
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Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify that Sysco notified defense counsel of Sysco's intention to file this motion to seal the unredacted complaint, and defense counsel did not state any objection to the relief being sought.

/s/ Scott E. Gant
Scott E. Gant (attorney-in-charge)

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2018, a true and correct copy of the foregoing document will be served upon counsel via electronic mail.

/s/ Scott E. Gant
Scott E. Gant (attorney-in-charge)

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